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12 Attorneys for Plaintiff JENS ERIK SORENSEN,
13 as Trustee of SORENSEN RESEARCH AND
14 DEVELOPMENT TRUST

15 UNITED STATES DISTRICT COURT

16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 SORENSEN RESEARCH AND
18 DEVELOPMENT TRUST,

19 Plaintiff,

20 v.

21 FIRST INTERNATIONAL DIGITAL, INC.

22 Defendant.

23 SORENSEN RESEARCH AND
24 DEVELOPMENT TRUST,

25 Plaintiff,

26 v.

27 DIGITAL NETWORKS NORTH AMERICA,
28 Defendant.

Case No. C 075525 JSW

**PLAINTIFF'S RESPONSE TO JUDICIAL
REFERRAL FOR PURPOSE OF
DETERMINING RELATIONSHIP OF
CASES**

Case No. 07-05568 JSW

29 SORENSEN RESEARCH AND
30 DEVELOPMENT TRUST,

31 Plaintiff,

32 v.

33 AMPRO TOOLS CORPORATION

34 Defendant.

Case No. 08-00096 CW

1 Plaintiff Jens Erik Sorensen as Trustee of Sorensen Research and
2 Development Trust ("Sorensen") hereby submits its opposition to an order relating
3 the above-captioned cases for the reasons set forth herein.

4 Pursuant to Civil L.R. 3-12(c), an action is related to another when (1) the
5 actions concern substantially the same parties, property, transaction or event; and (2)
6 it appears likely that there will be an unduly burdensome duplication of labor and
7 expense or conflicting results if the cases are conducted before different Judges.

8 *Sorensen v. First International Digital, Inc., et al*, Case No. 07-05525, does
9 not meet these criteria because the case does not have any overlapping defendants or
10 products accused of patent infringement with either of the other two cases, and
11 because a default judgment has already been entered in the case.

12 *Sorensen v. Digital Networks North America, Inc., et al*, Case No. 07-05568,
13 does not meet these criteria either because the case does not have any overlapping
14 defendants or products accused of patent infringement with either of the other two
15 cases.

16 *Sorensen v. Ampro Tools Corporation*, Case No. 08-00096, does not meet
17 these criteria because the case does not have any overlapping defendants or products
18 accused of patent infringement with either of the other two cases, and because
19 default has already been entered against the Defendant.

20
21 DATED this 31st day of March, 2008.

22
23 JENS ERIK SORENSEN, as Trustee of
24 SORENSEN RESEARCH AND DEVELOPMENT
TRUST, Plaintiff

25 /s/ Melody A. Kramer

26
27 Melody A. Kramer, Esq.
J. Michael Kaler, Esq.
28 Attorneys for Plaintiff

Proof of Service

I, Melody A. Kramer, declare:

I am and was at the time of this service working within the County of San Diego, California. I am over the age of 18 years and not a party to the within action. My business address is Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, CA 92121.

On March 31, 2008, I served the following documents:

**PLAINTIFF'S RESPONSE TO JUDICIAL REFERRAL FOR PURPOSE OF
DETERMINING RELATIONSHIP OF CASES**

on the parties to this action as follows:

AMPRO TOOLS CORPORATION

c/o Agent for Service of Process

CELIA CHU

1108 ELMSFORD DR

CUPERTINO, CA 95014

By FedEx. I deposited with the FedEx a sealed envelope containing a true copy of the foregoing documents with postage fully prepaid addressed to the above-noted addressee.

I declare that the foregoing is true and correct, and this declaration was executed on March 31, 2008, in San Diego, California.

/s/ Melody A. Kramer
Melody A. Kramer, Esq.